

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

OCT 17 2003

By: *B. Becker*

IN RE: TRI-STATE :
CREMATORY LITIGATION : MDL DOCKET NO. 1467
:
This relates to all actions. :

R. DUDLEY BARTON & SON FUNERAL HOME, INC.'S,
SEQUATCHIE VALLEY MEMORIAL FUNERAL HOME AND GARDENS,
INC.'S, ERWIN-PETITT FUNERAL HOME, INC.'S,
RYAN FUNERAL HOME INC.'S, R. D. MOORE FUNERAL HOME INC.'S,
TAYLOR FUNERAL HOME OF CHATTANOOGA, INCORPORATED'S,
AND THOMAS & SON FUNERAL HOME, INC.'S,
REQUEST TO FILE ORIGINAL DISCOVERY

COME NOW R. DUDLEY BARTON & SON FUNERAL HOME, INC.,
SEQUATCHIE VALLEY MEMORIAL FUNERAL HOME AND GARDENS, INC.,
ERWIN-PETITT FUNERAL HOME, INC.'S, RYAN FUNERAL HOME INC., R. D.
MOORE FUNERAL HOME, INC., TAYLOR FUNERAL HOME OF
CHATTANOOGA, INCORPORATED, and THOMAS & SON FUNERAL HOME,
INC., Defendants in the above-styled civil action, and pursuant to Fed. R. Civ. P. 56,
request that the Plaintiffs file the following original discovery:

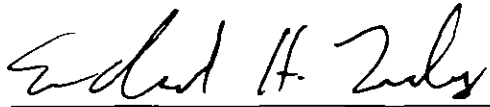
1. Deloris Headrick's Responses to Defendants' First Master Set of
Interrogatories and Request for Production of Documents;
2. Original Deposition of Robert A. Ryan, Jr.;

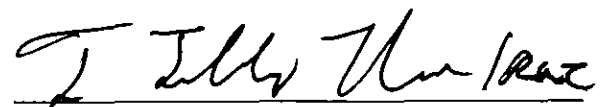
3. Original Deposition of John Taylor;
4. Original Deposition of James C. Eggert;
5. Original Deposition of Robert Dudley Barton, IV;
6. Original Deposition of Durward Petitt; and
7. Original Deposition of Larry Moore.

Respectfully submitted this 15 day of October, 2003.

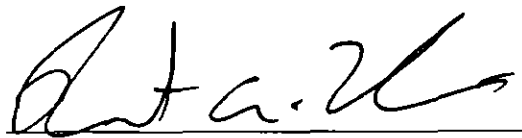
Respectfully Submitted,

GOODMAN, MCGUFFEY, LINDSEY &
JOHNSON, LLP

By: 
EDWARD H. LINDSEY, JR.
Georgia State Bar No. 453075

By: 
T. JEFFERY LEHMAN
Georgia State Bar No. 445725

(Signatures Continued on Next Page)

By: 
ROBERT A. LUSKIN
Georgia State Bar No. 004383

Attorneys for Defendants R. Dudley Barton
& Son Funeral Home, Inc., Sequatchie
Valley Memorial Funeral Home and Gardens,
Inc., Ryan Funeral Home Inc., R. D. Moore
Funeral Home, Inc., Taylor Funeral Home
of Chattanooga, Incorporated, and Thomas
& Son Funeral Home, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
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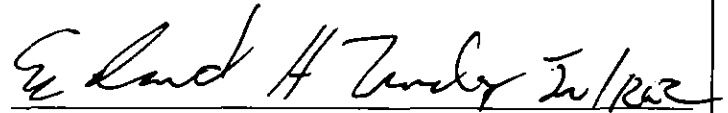
CERTIFICATE OF FONT AND POINT SIZE

The font and point style used in this **R. DUDLEY BARTON & SON
FUNERAL HOME, INC.'S REQUEST TO FILE ORIGINAL DISCOVERY** is
Times New Roman 14 Point.

This 15 day of October, 2003.

Respectfully Submitted,

GOODMAN, McGUFFEY, LINDSEY
& JOHNSON, LLP



EDWARD H. LINDSEY, JR.
Georgia State Bar No. 453075



T. JEFFERY LEHMAN
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ROBERT A. LUSKIN

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CERTIFICATE OF SERVICE

This is to certify that I have this date served upon counsel in the above captioned lawsuit a copy of the foregoing **R. DUDLEY BARTON & SON FUNERAL HOME, INC.'S, SEQUATCHIE VALLEY MEMORIAL FUNERAL HOME AND GARDENS, INC.'S, ERWIN-PETITT FUNERAL HOME, INC.'S, RYAN FUNERAL HOME INC.'S, R. D. MOORE FUNERAL HOME INC.'S, TAYLOR FUNERAL HOME OF CHATTANOOGA, INCORPORATED'S, AND THOMAS & SON FUNERAL HOME, INC.'S, REQUEST TO FILE ORIGINAL DISCOVERY** by depositing same in the United States Mail with proper postage affixed thereon and addressed to:

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McCamy, Phillips, Tuggle &
Fordham, LLP
P.O. Box 1105
Dalton, GA 30720

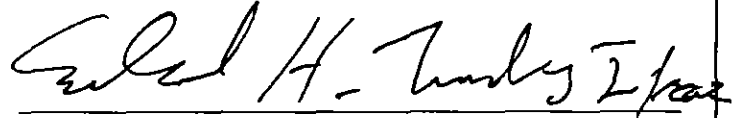
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This 15 day of October, 2003.

By:



EDWARD H. LINDSEY, JR.

Georgia State Bar No. 453075

Attorneys for Defendants R. Dudley Barton &
Son Funeral Home, Inc., Sequatchie Valley
Memorial Funeral Home and Gardens, Inc.,
Ryan Funeral Home Inc., R. D. Moore Funeral
Home, Inc., Taylor Funeral Home of
Chattanooga, Incorporated, and Thomas & Son
Funeral Home, Inc.